



DATE: July 9, 1985

TO: Land Division File

FROM: Rick Lanham, DLPC/FOS - Central Region

SUBJECT: ^{RL} LPC #1671205030 - Sangamon County - Springfield/Industrial Chemical
ILD #980702617



On July 9, 1985, an ISS inspection for storage was conducted at Industrial Chemical Co. Inc., from 1:35 - 3:10 p.m. Previously, on May 28, 1985, a transporter inspection was conducted at this site. On that date, the following apparent violations of the 35 IL A.C., Subtitle G were noted: 1) 723.112; 2) 723.120(d); and 3) 723.122 (see memo of 5-28-85). At that time a review of all hazardous waste manifests on-site determined that Industrial Chemical was storing hazardous waste on-site for more than the 10 days allowed; an apparent violation of 723.112.

On January 31, 1985, Mr. Steve Boswell (Industrial Chemical) accepted from Mr. Jim Meyers of Miles Chevrolet, Inc. (Decatur, IL), 17 drums (55 gallons each) of paint thinner (spent solvent, D001). The drums of hazardous waste were received by Pam Fenster of Clayton Chemical Co. on February 21, 1985; under manifest #1122551. Also, on March 19, 1985, Steve Boswell (Industrial Chemical) accepted from Neal Clark of AC & R (Chatham, IL), a total of 6 drums (55 gallons each); 3 of 1, 1, 1, trichloroethane (F002), 2 of compound lacquer thinner (spent solvent, F003), and 1 of petroleum naptha (D001). The 6 drums of hazardous waste were received by Pam Fenster of Clayton Chemical Co. on May 6, 1985, under manifest #1122580. I explained the apparent violation of Section 723.112 to Mr. Quinn and he stated that his understanding was that the regulations allowed for 30 days storage. Mr. Quinn's misunderstanding of the regulations was apparently based on a telephone discussion between Mr. Quinn and Steve Colantino (IEPA/LPC).

At the time of the May 28, 1985 inspection, only the transporter segment of the inspection was conducted. After conferring with Mr. Colantino, it was determined that no extension of the 10 day hazardous storage limit had been granted.

On July 9, 1985, Mr. Paul Thompson, President of Industrial Chemical Co. Inc., was interviewed at the site. Again, the apparent violation of 35 IL A.C., Subtitle G, 723.112, and the facility being subject to regulations under Parts 724 and 725 and 40 CFR, Part 122 with respect to the storage of those wastes, was explained to Mr. Thompson. Mr. Thompson stated that he may stop transporting hazardous waste if the apparent violations could not be readily resolved.

Also, Mr. Thompson stated that 1) his company transports hazardous waste for approximately six (6) Small Quantity Generators in the Springfield

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area (see May 28, 1985 memo); 2) that locally the waste was transported in vehicles that have a capacity of approximately 5-15, fifty-five gallon drums; 3) the drums are transported to Clayton Chemical (Sauget, IL) via a transport tractor that has a 60 drum capacity; 4) for calendar year 1984, approximately 60 drums of hazardous waste were transported and; 5) for calendar year 1985, approximately 20 drums of hazardous waste have been transported to date.

The ISS inspection to determine the compliance with regards to the storage regulations under Parts 724 and 725 and 40 CFR, Part 122 found the following apparent violations:

- | | |
|----------------------------|----------------|
| 1. 703.150(a)(2) | 10. 725.151(a) |
| 2. 723.112 | 11. 725.155 |
| 3. 725.113(a),(b),(c) | 12. 725.171(c) |
| 4. 725.114(b)(1),(b)(2)(B) | 13. 725.173 |
| 5. 725.114(c) | 14. 725.175 |
| 6. 725.115(a),(b),(d) | 15. 725.212 |
| 7. 725.116(a),(d) | 16. 722.120(a) |
| 8. 725.133 | 17. 725.274 |
| 9. 725.137 | |

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